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PA 000293037  
KOL

Spring O'Mara  
Environmental Engineer

ConocoPhillips  
Trainer Refinery  
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Mr. Bruce Augustine  
USEPA Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

RECEIVED  
JAN 4 2011  
Division Director (3AP00)

December 28, 2010

**Certified Mail Return Receipt - 7009 2820 0002 5400 1884**

**RE: Request for Alternative Method of Compliance for FCCU CEMS subject to 40 CFR 60 Subpart J  
ConocoPhillips Trainer Refinery, Federal Tax Id – Plant Code: 73-0400345-1,  
Permit No. 23-00003**

Dear Mr. Augustine:

This letter is to request the approval of an alternative method of compliance for the monitoring requirements associated with the Fluid Catalytic Cracking Unit (FCCU) Continuous Emissions Monitoring System (CEMS). Specifically, ConocoPhillips requests the approval to follow the Range Specifications for the Oxygen Monitoring System requirements contained in the Pennsylvania Department of Environmental Protection (PADEP) regulations/Continuous Source Monitoring Manual, Table III, in lieu of the span requirement for the O<sub>2</sub> Monitoring System identified in 40 CFR Part 60 Subpart J.

The Trainer Refinery has one FCCU. The FCCU CEMS was installed during the scheduled Trainer Refinery turnaround in April/May 2006 and become operational upon startup in mid-May 2006. The continuous emissions monitoring of CO, SO<sub>2</sub> and O<sub>2</sub> is required to comply with 40 CFR 60 Subpart J per the ConocoPhillips Consent Decree (Civil Action No. H-05-0258, paragraph 87) by December 31, 2006. The continuous emissions monitoring of NO<sub>x</sub> is required to comply with 40 CFR 60.13 and 40 CFR Appendices A and F per the ConocoPhillips Consent Decree (Civil Action No. H-05-0258, paragraph 54) by December 31, 2006. In addition, the CEMS is required to comply with monitoring, record keeping and reporting requirements as identified in the PADEP Continuous Source Monitoring Manual (CSMM).

The specifics of the regulation requirements for O<sub>2</sub> analyzers are shown below. As noted in our request, ConocoPhillips proposes to follow the PADEP rules.

## Monitoring Specification of O<sub>2</sub> Monitors

The PADEP specification for the range of oxygen monitors is 0-25%. However, 40 CFR §60.105(a)(10) specifies a span of 10% for an O<sub>2</sub> analyzer used with an SO<sub>2</sub> analyzer on an FCC for which the owner or operator has elected to comply with §60.104(b)(1) with an add-on control device. Under 40 CFR Appendix F to Part 60 -- Quality Assurance Procedures **Span Value** is defined as the upper limit of a gas concentration measurement range... which is the equivalent definition of **range** under the PADEP CSMM.

ConocoPhillips is requesting an approval from the EPA that compliance with PADEP O<sub>2</sub> analyzer range requirements will demonstrate compliance with Subpart J.

This request is similar to an earlier proposal made by ConocoPhillips to comply with the requirements of the PADEP CSMM in lieu of the quality assurance procedures in 40 CFR Part 60 Appendix F. A copy of the EPA approval letter (dated March 24, 2006) is attached so that it can be used as a precedent to expedite the approval of this request for the FCCU O<sub>2</sub> analyzer located at the ConocoPhillips Trainer Refinery.

If you have any questions or concerns, please contact me at the above telephone number.

Sincerely,



Spring O'Mara

cc:

Mr. Charles Zadakis, Chief (**Certified Mail Return Receipt 7009 2820 0002 5400 1860**)  
Pennsylvania Department of Environmental Protection  
Continuous Emission Monitoring Section  
Div. of Tech. Services and Monitoring  
Bureau of Air Quality Control  
400 Market Street  
Harrisburg, Pa 17105-8468

Mr. Joseph A. Feola (**Certified Mail Return Receipt 7009 2820 0002 5400 1877**)  
PA Department of Environmental Protection  
Bureau of Air Quality  
2 East Main St.  
Norristown, PA 19401



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

HSE 100-100-150C-17-00000000  
EPA APPROVAL

Mr. Prasad V. Tamminayana, Environmental Engineer  
Conoco Phillips/Trainer Refinery  
4101 Post Road  
Trainer, PA 19061

24 MAR 2006

Dear Mr. Tamminayana:

This letter is in response to your February 24, 2006 request for an alternative method of compliance for the certification, operation, recordkeeping and data reporting requirements for the continuous emissions monitoring system ("CEMS") installed at the fluid catalytic cracking unit ("FCCU") at Conoco Phillips' Trainer Refinery, located in Trainer, PA. The FCCU is subject to the MACT II standards at 40 C.F.R. Part 63, Subpart UUU and recently became subject to the emission limits in 40 C.F.R. Part 60, Subpart J through the Consent Decree signed by the United States Environmental Protection Agency ("EPA") and Conoco Phillips (Civil Action No. H-05-0258). MACT II, the consent decree and New Source Performance Standards ("NSPS") Subpart J require the installation of a CEMS to monitor compliance with carbon monoxide, sulfur dioxide, nitrogen oxides and opacity emission limits. The CEMS at the Trainer Refinery are also subject to the requirements of the Pennsylvania Department of Environmental Protection ("PADEP") CEMS Guidance Manual.

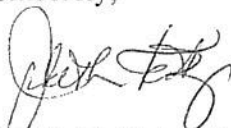
Conoco Phillips has proposed to comply with the requirements of the PADEP CEMS Guidance Manual for the FCCU CEMS in lieu of the quality assurance procedures in 40 C.F.R. Part 60, Appendix F and the monitoring, recordkeeping, and reporting requirements of NSPS Subpart A & J and MACT II. Conoco Phillips indicated that the PADEP manual is at least as stringent for the parameters identified in the letter. The following table highlights the differences between EPA standards and PADEP CEM requirements:

|                                | EPA  | PADEP   |
|--------------------------------|--|---|
| Definition of "Out-of-Control" | A CEM is out of control under Appendix F if calibration drift is twice the limit of 2.5% of span specified in PS-2 on 5 consecutive days or 4 times this limit on any given day. | A CEM is out-of-control if calibration drift is twice the calibration value on any given day. |
| Cylinder Gas Audits            | EPA requires a two point CGA using the ranges 20-30% and 50-60%.   | PADEP requires a three point CGA using ranges of 0-30%, 40-60%, and 80-100%.                  |
| CGA Frequency                  | MACT II requires facility to follow Appendix F except only yearly RATA is required and CGA's.  | Requires a CGA every quarter regardless of RATA testing.                                      |
| Reporting Frequency            | MACT II & Subpart J require semi-annual reports.   | PADEP requires quarterly electronic data reports.   |
| Report Content                 | Content specified in applicable subparts   | Content specified in CEMS manual  |

EPA is approving Conoco Phillips' request to comply with the PADEP CEMS Guidance Manual in place of Appendix F requirements for the parameters identified above except for Conoco Phillips request to submit quarterly reports in lieu of report under NSPS Subpart J. Conoco Phillips must continue to submit reports under Subpart J, although they may be combined with PADEP required reports. Conoco Phillips must continue to comply with all other applicable requirements of NSPS Subpart J, MACT II, the consent decree and Appendix F not identified in this letter. In addition, Conoco Phillips will continue to comply with the Startup, Shutdown, Malfunction requirements of MACT II.

This approval is similar to a determination issued by EPA on July 13, 2005 for the CEMS at the Trainer Refinery's sulfur recovery unit. If you have any questions or comments regarding this letter, do not hesitate to contact Bruce Augustine, of the Air Protection Division, at (215) 814-2131.

Sincerely,



Judith M. Katz, Director  
Air Protection Division

Cc: Charles Zadakis, Chief  
PADEP  
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Division of Technical Services & Monitoring  
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